

HANSON BRIDGETT LLP
KATHERINE A. BOWLES, SBN 287426
kbowles@hansonbridgett.com
STELLA PADILLA, SBN 301590
spadilla@hansonbridgett.com
ROBERT G. DAVIS, SBN 304758
rdavis@hansonbridgett.com
777 S. Figueroa Street, Suite 4200
Los Angeles, California 90017
Telephone: (213) 395-7620
Facsimile: (213) 395-7615

Attorneys for Leprino Foods Company,
Leprino Foods Health & Welfare Plan

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

LEPRINO FOODS COMPANY;
LEPRINO FOODS HEALTH &
WELFARE PLAN,

Plaintiffs,

v.

AVANI OUTPATIENT SURGICAL
CENTER, INC., a California
Corporation; MOUNTAIN VIEW
SURGICAL CENTER, INC., a
California Corporation; THE
CENTER FOR SURGERY AT
BEDFORD, LLC, a California limited
liability company; AMY ZARAGOZA,
an individual; BABEK
MOEINOLMOLKI, an individual;
BENHAM KASHANCHI, an
individual; SAMUEL KASHANI, an
individual; SHERVIN AMINPOUR,
an individual; RALPH MAYER, an
individual; MICHAEL YADEGARI, an
individual; KARAPET
DERMENDJIAN, an individual;
SEPEHR LALEZARI, an individual;
MARIO ROSENBERG, an individual;
PEYMAN SOLIEMANZADEH, an
individual; and DOES 1-30,

Defendants.

Case No. 2:22-cv-07434 DSF (JC)

Assigned to Judge Dale S. Fischer.
Courtroom 7D

**REQUEST FOR ENTRY OF
DEFAULT AGAINST DEFENDANT
CRISTINA LUZ PERRYMAN**

*Filed concurrently with Declaration
of Katherine A. Bowles*

Action Filed: October 12, 2022
Trial Date: August 13, 2024

AND RELATED COUNTERCLAIMS.

ATTENTION CLERK OF THE ABOVE-ENTITLED COURT:

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiffs LEPRINO FOODS COMPANY and LEPRINO FOODS HEALTH & WELFARE PLAN (collectively "Leprino") request that the Clerk of the above-entitled Court enter default in this matter against defendant CRISTINA LUZ PERRYMAN ("Perryman" or "Defendant") on the grounds that said Defendant has failed to appear or otherwise respond to the operative complaint within the time prescribed by the Federal Rules of Civil Procedure.

Leprino served the Third Amended Complaint (Dkt. 251, the "Operative Complaint") on Perryman on October 8, 2023, as evidenced by the proof of service of summons filed in this Court on October 13, 2023 (Dkt. 271). To date, no response to the Operative Complaint has been filed by Perryman and the time for filing this response has now expired.

The above-stated facts are set forth in the accompanying Declaration of Katherine A. Bowles, filed herewith.

DATED: November 8, 2023

HANSON BRIDGETT LLP

By:


KATHERINE A. BOWLES

ROBERT G. DAVIS

STELLA PADILLA

Attorneys for Leprino Foods Company,
Leprino Foods Health & Welfare Plan

PROOF OF SERVICE

Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et al.

U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of . My business address is 777 S. Figueroa Street, Suite 4200, Los Angeles, CA 90017.

On November 9, 2023, I served true copies of the following document(s) described as **REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT CRISTINA LUZ PERRYMAN** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

BY HAND DELIVERY: I caused such envelope(s) to be delivered by hand to the office of the addressee(s).

**Cristina Luz Perryman
2256 Pleasant Court
Hanford, CA 93230**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on November 9, 2023, at Los Angeles, California.

/s/ Silvia Abrignani
Silvia Abrignani

SERVICE LIST

Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et al.

U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)

Nicholas D. Jurkowitz
James A.F. Curcio
Fenton Law Group LLP
1990 S. Bundy Drive, Suite 777
Los Angeles, CA 90025
PH: 310-444-5244
FX: 310-444-5280
Emails:
njurkowitz@fentonlawgroup.com
jcurcio@fentonlawgroup.com
nnatelsky@fentonlawgroup.com
esun@fentonlawgroup.com

Attorneys for Defendants
Avani Outpatient Surgical Center,
Inc., and Mountain View Surgical
Center, Inc.

Jerry Sparks, Esq.
Sparks Law Firm, APC
650 Town Center Drive, Suite 1200
Costa Mesa, CA 92626
PH: 714-546-4300
FX: 714-546-5430
irs@sparksfirm.com

Attorney for Defendant
Ralph Mayer

Nigel Burns, Esq.
Nick Stahl
The Law Offices of Nigel Burns
800 West 1st St., Suite 401-12
Los Angeles, CA 90012
PH: 213-687-8080
FX: 213-687-8383
nburns@burnsattorneys.com
nstahl@burnsattorneys.com
dturner@burnsattorneys.com

Attorney for Defendant
Amy Zaragoza

Bruce A. Berman
The Berman Law Firm, APC
1875 Century Park East, Ste. 2230
Los Angeles, CA 90067
PH: 213-683-1908
Email: Bruce@bermanlawapc.com

Attorney for Defendant
The Center for Surgery at Bedford,
LLC

[Note: Updated April 2023]

1 Michael M. Amir
Mary Tesh Glarum
2 Doll Amir & Eley LLP
725 S. Figueroa Street, Suite 3275
3 Los Angeles, CA 90017
PH: 213.542.3380
4 FX: 213.542.3381
Emails:
5 mamir@dollamir.com
mglarum@dollamir.com
6 cramirez@dollamir.com

Attorneys for Defendant
Sepehr Lalezari

7
8 James J. Kjar
Kylie A. Schofield
Kjar, McKenna & Stockalper, LLP
9 840 Apollo Street, Suite 100
El Segundo, CA 90245
10 PH: 424-217-3026
FX: 424-367-0400
11 Emails:
kjar@kmslegal.com
12 kschofield@kmslegal.com
dharris@kmslegal.com
13 joneill@kmslegal.com

Attorneys for Defendant
Karapet Dermendjian

14 Steven M. Goldsobel
15 Vandad Khosravirad
Law Offices of Steven Goldsobel
16 1901 Avenue of the Stars, Suite 1750
Los Angeles, CA 90067
17 PH: 310-552-4848
E-mails:
18 steve@sgoldsobel.com
vandad@sgoldsobel.com
19 samantha@goldsobel.com

Attorney for Defendant
Shervin Aminpour

20 Ryan G. Jacobson
Edward A. Stumpp
21 Helton Law Group APC
1590 Corporate Drive
22 Costa Mesa, CA 92626
T: 562-901-4499 /F: 562-901-4488
23 Emails:
estumpp@helton.law
24 riacobson@helton.law

Attorney for Defendant
Michael Yadegari

1 Benjamin N. Gluck
2 Elliot C. Harvey Schatmeier
3 Bird, Marella, Boxer, Wolpert,
4 Nessim, Dooks, Lincenberg & Rhow,
5 P.C.
6 1875 Century Park East, 23rd Floor
7 Los Angeles, California 90067
8 PH: (310) 201-2100
9 FX: (310) 201-2110
10 Emails:
11 bgluck@birdmarella.com
12 ehs@birdmarella.com
13 dthrockmorton@birdmarella.com
14 tdicks@birdmarella.com

Attorney for Defendant
Dr. Samuel Kashani; Daniel
Shouhed, M.D.

9 Gary L. Tysch
10 Law Offices of Gary L. Tysch
11 16133 Ventura Blvd., Ste. 580
12 Encino, CA 91436
13 PH: 818-995-9555
14 Fax: 818-995-9550
15 gltyisch@pacbell.net

Attorney for Defendant
Babek Moeinolmolki

13 Scott J. Stitt
14 Anna-Sophie Tirre
15 Tucker Ellis LLP
16 515 South Flower Street Forty
17 Second Floor
18 Los Angeles, CA 90071-2223
19 Direct: 213-430-3304 (LA) | Cell: 614-
20 738-0865
21 scott.stitt@tuckerellis.com
22 anna-sophie.tirre@tuckerellis.com
23 sofia.escalante@tuckerellis.com

Attorneys for Mojgan Kashanchi as
Administrator of Behnam
Kashanchi's Estate, Trustee of The
Behnam Kashanchi & Mojgan
Kashanchi Revocable Living Trust,
and Trustee of the Kashanchi B & M
Living Trust

20 Cristina Luz Perryman
21 2256 Pleasant Court
22 Hanford. CA 93230

In Pro Per
PERSONAL SERVICE ONLY